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6	Attorney for Defendant/Counterclaiman	nt	
7	Chai Research Corp.		
8			
9	UNITED STATES DISTRICT COURT		
10			
11	DISTRICT OF ARIZONA		
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13			
14	Zhang JC, an individual,	Case No. 24-cv-267-SMB	
15	D1 : 4:00/G	AFFIDAVIT OF WILLIAM	
16	Plaintiff/Counterdefendant,	BEAUCHAMP IN SUPPORT OF CHAI	
17	V.	RESEARCH CORP.'S MOTION FOR SUMMARY JUDGMENT	
18	Chai Research Corp,		
19	Defendant/Counterclaimant.		
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I, William Beauchamp hereby declare as follows:

- 1. My name is William Beauchamp. I am a resident of the State of California, am over the age of 18 years, and if called to testify in court or other proceeding I could and would give the following testimony which is based upon my own personal knowledge.
- 2. I am the founder and CEO of Defendant/Counterclaimant Chai Research Corporation. I have worked for Chai for more than two years.

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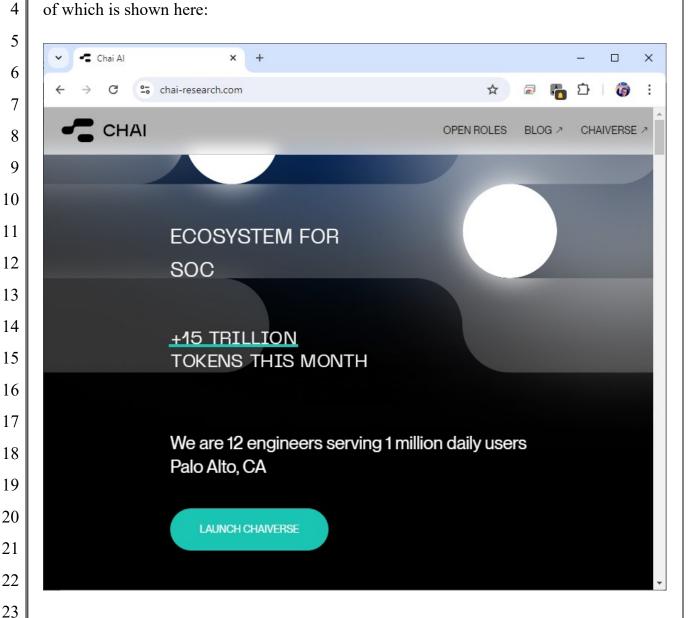
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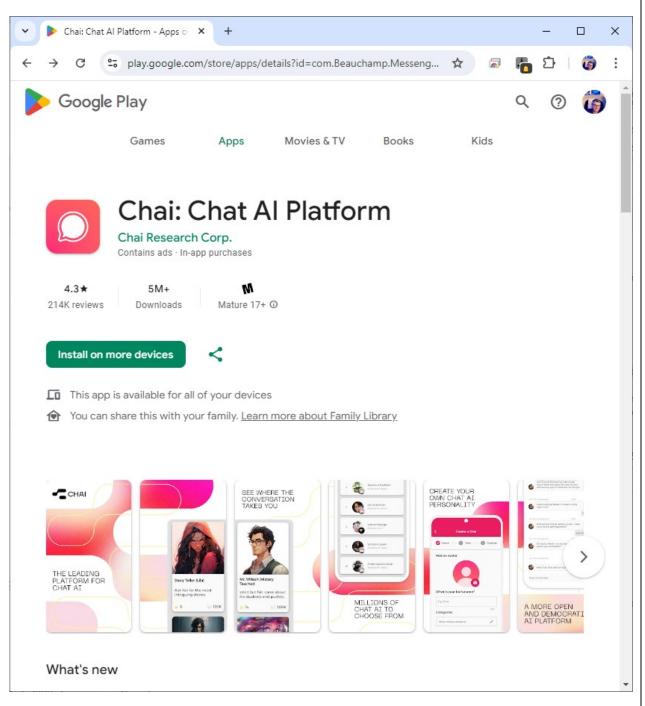
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- 3. In my capacity as CEO of Chai, I am familiar with the company's business operations, the products and services it offers, and marketing relating to the company.
- Chai's primary website is https://www.chai-research.com/, the home screen of which is shown here:



5. Among other things, one of Chai's primary business offerings is a software application or "app" called: "Chai: Chat AI Platform". The Chai AI platform is a "chatbot" which allows users to speak with a variety of artificial intelligence-based "bots" which have different personas.

6. As reflected below, Chai's Chat AI app is currently offered in the Google Play store as well as Apple's appstore. As of August 2, 2024, the app has been downloaded more than 5 million times, and has a favorable rating of 4.3 stars (out of 5) with more than 214,000 reviews on the Google Play Store alone.



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7. A description of the Chai Chat AI app, as advertised on the Google Play Store, is shown here:

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4	Chai: Chat Al Platform ×		
5	About this app		
6	Chat + AI = Chai		
7	Discover chat AIs from around the globe and speak with them to discover their capabilities. Make Friends. 18+		
8	SWIPE		
9	Simply swipe to start. Chat with AIs you like, skip ones you don't. Swipe to your heart's content.		
10	CHAT		
11	A personalised stream of AIs based on what you like, who you speak to and which conversations you engage with the most.		
12	ENGAGE		
13	From your morning cup of tea to brushing your teeth at night, Chai has the conversations to make your day. Whether you're a chatterbox, a tech fanatic or simply looking for a laugh, there's something for		
14	everyone. Enjoy a never-ending stream of AIs you'll love to chat to.		
15	Join our community on Reddit at https://www.reddit.com/r/ChaiApp/		
16	Connect with the team on LinkedIn: https://www.linkedin.com/company/chai-research/		
17			
18	Version Updated on		
19	0.4.185 Jul 26, 2024		
20	Requires Android Downloads		
21	6.0 and up 5,000,000+ downloads		
22	In-app purchases Content rating		
23	\$0.99 - \$269.99 per item Mature 17+ • Violence, Sexual Themes, Use of		

- Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury under the laws of the
- 25 United States of America that the foregoing is true and correct.
 - EXECUTED ON: August 2, 2024.

/s/ William Beauchamp_ By William Beauchamp